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8 *Counsel for Hartford Life and Annuity*
9 *Insurance Company (now known as Talcott*
10 *Resolution Life and Annuity Company),*
11 *Hartford Total Return Bond ETF, Hartford*
12 *Total Return Bond Fund, Hartford Total*
13 *Return Bond HLS Fund, The Hartford*
14 *Strategic Income Fund, HIMCO Duration*
15 *Matched Division Ser. II, and HIMCO US*
16 *Aggregate Bond Index Division*

17 **UNITED STATES BANKRUPTCY COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 In re PG&E CORPORATION

Bankruptcy Case No. 19-30088 (DM)

21 -and-

22 PACIFIC GAS AND ELECTRIC
23 COMPANY,

MOTION FOR LEAVE TO FILE LATE
AND OPPOSITION TO REORGANIZED
DEBTORS' ELEVENTH SECURITIES
CLAIMS OMNIBUS OBJECTION
(CLAIMS BARRED BY THE STATUTE
OF REPOSE)

24 Debtors

25 Affects both Debtors

Hearing Information:

Date: September 14, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephone Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

Related to Dkt. Nos. 11014, 11168

26 Hartford Life and Annuity Insurance Company (now known as Talcott Resolution
27 Life and Annuity Company), Hartford Total Return Bond ETF, Hartford Total Return Bond
28 Fund, Hartford Total Return Bond HLS Fund, The Hartford Strategic Income Fund, HIMCO

1 Duration Matched Division Ser. II, HIMCO US Aggregate Bond Index Division, and (together,
2 the “Hartford Eleventh Omnibus Challenged Claimants”)¹ hereby respectfully submit this
3 Motion to File Opposition Late and to Oppose Reorganized Debtors’ Eleventh Securities
4 Claims Omnibus Objection [Dkt. No. 11014].¹

5
6 **MOTION FOR LEAVE TO FILE OPPOSITION LATE**

7 As ground for this motion, the Hartford Eleventh Omnibus Challenged Claimants state
8 that they did not receive effective notice of the Eleventh Securities Claims Omnibus Objection
9 and were unable to lodge their objection until today. In addition, since other claimants lodged
10 objections before and after the purported August 31, 2021 deadline to do so, there will be no
11 prejudice to the parties or disruption of the Court’s schedule by allowing the Hartford Eleventh
12 Omnibus Challenged Claimants to appear and assert their opposition to the Debtors’ Eleventh
13 Securities Claims Omnibus Objection.
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15 **OPPOSITION**

16 The Hartford Eleventh Omnibus Challenged Claimants respectfully join in the
17 substantive Oppositions already on file to the Debtors’ Eleventh Securities Claims Omnibus
18 Objection. [Dkt. Nos. 11168 and 11170]. In addition, and without limitation, the Hartford
19 Eleventh Omnibus Challenged Claimants state, based on investigation of counsel, that there were
20 numerous data import errors associated with claims filings received by Prime Clerk and therefore
21 the information upon which the Radetich and Keable Declarations are based is not reliable. The
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27 ¹ A list of the applicable claim numbers and other pertinent information for each of the
28 Hartford Eleventh Omnibus Challenged Claimants is attached hereto as **Appendix A**.

1 Hartford Eleventh Omnibus Challenged Claims Claimants are working with the claims
2 administrator to reconcile their transactional data and the information in the claims
3 administrator's database, which process is not complete. Nor did the Hartford Eleventh
4 Omnibus Challenged Claimants submit their claims herein exclusively under Section 11 of the
5 Securities Act and therefore the Statute of Repose does not bar the compensation to which the
6 Hartford Eleventh Omnibus Challenged Claimants are entitled arising from any other basis.
7

8 **RESERVATION OF RIGHTS**

9 The Hartford Eleventh Omnibus Challenged Claimants reserve all their respective
10 rights, claims, defenses, and remedies, including, without limitation, the right to amend,
11 modify or supplement this Opposition in accordance with applicable rules.
12

13 Dated: September 3, 2021

BLA SCHWARTZ, P.C.

14
15 By: /s/ Irwin B. Schwartz
16 Irwin B. Schwartz

17 Counsel for Hartford Life and Annuity Insurance
18 Company (now known as Talcott Resolution Life
19 and Annuity Company), Hartford Total Return
20 Bond ETF, Hartford Total Return Bond Fund,
21 Hartford Total Return Bond HLS Fund, The
22 Hartford Strategic Income Fund, HIMCO Duration
23 Matched Division Ser. II, HIMCO US Aggregate
24 Bond Index Division
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Signed under the penalties of perjury on this 3rd day of September 2021.

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APPENDIX A

CREDITOR	CLAIM NO.	DATE	AMOUNT OF CLAIM	NOTICE ADDRESS
Talcott Resolution and Annuity Insurance Company	100313	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
HIMCO US Aggregate Bond Index Division	100877	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
Hartford Life and Annuity Insurance Company (now known as Talcott Resolution Life and Annuity Insurance Company)	101156	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
The Hartford Strategic Income Fund	101189	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford</p>

				<p>One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
Hartford Total Return Bond ETF	101204	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
Hartford Total Return Bond HLS Fund	101225	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
The Hartford Strategic Income Fund	101383	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C.</p>

				One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com
The Hartford Total Return Bond Fund	101956	4/16/2020	Unliquidated	Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com With a copy to: Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com
Hartford Total Return Bond ETF	101958	4/16/2020	Unliquidated	Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com With a copy to: Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com
HIMCO Duration Matched Division Ser II	101981	4/16/2020	Unliquidated	Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com With a copy to: Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com
HIMCO US Aggregate Bond Index Division	102003	4/16/2020	Unliquidated	Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B

				<p>Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
The Hartford Strategic Income Fund	102027	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>
HIMCO Duration Matched Division Ser II	102069	4/16/2020	Unliquidated	<p>Brenda J. Page Managing Associate General Counsel, Head of Investment Law, The Hartford One Hartford Plaza, NP5-B Hartford, CT 06155 (860) 297-6444 Brenda.Page@thehartford.com</p> <p>With a copy to:</p> <p>Irwin B. Schwartz BLA Schwartz P.C. One University Ave., Suite 302B Westwood, MA 02090 781-636-5032 ischwartz@blaschwartz.com</p>